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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

10 Ortal Rebecca Kouchnir p/k/a Tali or
Tali Kouch,

Case No. 2:23-cv-10694

12 Plaintiff,

COMPLAINT

14 Kevin Saurer p/k/a Hippie Sabotage, an
15 individual; Jeff Saurer an individual
16 p/k/a Hippie Sabotage; and Gadfly
17 Communications, Inc. d/b/a iHipHop
18 Distribution, a California corporation;
Orchard Enterprises NY, Inc., d/b/a The
Orchard, a New York corporation.

DEMAND FOR JURY TRIAL

20 Defendants.

Plaintiff Ortal Rebecca Kouchnir (“Tali”) hereby brings this Complaint against Defendants Kevin Saurer, Jeff Saurer p/k/a “Hippie Sabotage,” Gadfly Communications, Inc. d/b/a iHipHop Distribution, the Orchard Enterprises NY, Inc. d/b/a The Orchard and alleges as follows:

NATURE OF THE CASE

1. This is an action for: (i) copyright infringement under the Copyright Act
of 1976, 17 U.S.C. § 101 et seq. (the “Copyright Act”), and (2) copyright and moral

rights infringement under the Canadian Copyright Act R.S.C. 1985, c. C-42 (the "Canadian Copyright Act"). Tali seeks injunctive relief, as well as damages, attorneys' fees, and costs.

4 2. This copyright and moral rights infringement action involves the willful
5 and intentional reproduction, creation of derivative works, distribution by sale, and/or
6 public performance by means of digital audio transmission by Defendants, and each
7 of them, of a distinctive and significant sound recording by Tali entitled “Shadows,”
8 in violation of Tali’s exclusive rights granted under the U.S. Copyright Act and the
9 Canadian Copyright Act.

JURISDICTION AND VENUE

11 3. Tali's action involves a federal claim for copyright infringement under
12 § 501 of the Copyright Act.

13 4. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331
14 (actions arising under the Constitution, laws, or treaties of the U.S.), 1338(a) (actions
15 arising under Acts of Congress relating to copyrights), and 1367(a) (supplemental
16 jurisdiction over related claims, including foreign copyright infringement claims).
17 This Court also has subject matter jurisdiction under 28 U.S.C. § 1332(a), in that the
18 parties are citizens of different countries; the amount in controversy exceeds
19 \$75,000.00 as to each Defendant, exclusive of interest and costs, and the exercise of
20 supplemental jurisdiction under 28 U.S.C. § 1367(a) is consistent with the
21 jurisdictional requirements of 28 U.S.C. § 1332, in accordance with 28 U.S.C. §
22 1367(b).

23 5. This Court has personal jurisdiction over Defendants, and each of them,
24 because they either reside and/or conduct systematic and continuous business in the
25 State of California.

26 6. Alternatively, this Court may exercise personal jurisdiction over
27 Defendants because they purposefully direct their infringing activities toward the
28 State of California and, thus, purposefully avail themselves of the privileges of

1 conducting business in the State of California, and have directly harmed Tali in this
2 judicial district by reproducing, creating derivative works, distributing, selling and/or
3 offering for sale the infringing composition and sound recordings that infringes on
4 Tali's copyrights and moral rights, which Defendants, and each of them, knew or
5 should have known would cause injury to Tali in this judicial district.

6 7. Venue is proper because a substantial part of the events or omissions
7 giving rise to Tali's claims occurred in this judicial district.

THE PARTIES

9 8. Plaintiff Ortal Rebecca Kouchnir, professionally known as “Tali” or
10 “Tali Kouch,” is a singer-songwriter, who resides in Toronto, Canada.

11 9. Upon information and belief, Defendant Kevin Saurer is an individual
12 who resides in Los Angeles, California.

13 10. Upon information and belief, Defendant Jeff Saurer is an individual who
14 resides Los Angeles, California.

15 11. Upon information and belief, Defendants Kevin and Jeff Saurer are
16 professionally known as “Hippie Sabotage” (collectively, “Hippie Sabotage”).
17 Hippie Sabotage is an electronic dance music duo located in Los Angeles, California,
18 and they are the authors of the infringing composition and sound recordings at issue
19 in this matter and caused them to be distributed by sale and/or publicly performed by
20 means of digital audio transmission.

21 12. Upon information and belief, Defendant Gadfly Communications, Inc.
22 d/b/a iHipHop Distribution (“Gadfly”), is a corporation formed under the laws of
23 California, and conducts business in Los Angeles, California. Gadfly is Hippie
24 Sabotage’s music label and manager, and released the infringing composition and
25 sound recordings at issue and caused them to be distributed by sale and/or publicly
26 performed by means of digital audio transmission throughout the United States,
27 including into the State of California.

28 ||| 13. Upon information and belief, Defendant Orchard Enterprises NY, Inc.

1 d/b/a The Orchard (“Orchard”) is a New York corporation, with its principle place of
2 business in New York City, New York. Orchard is the music distributor for
3 Defendants Hippie Sabotage, who are residents of Los Angeles, California, and
4 caused the infringing composition and sound recordings at issue to be distributed by
5 sale and/or publicly performed by means of digital audio transmission throughout the
6 United States, including into the State of California.

14. At all times mentioned in this Complaint, Defendants, and each of them, were acting in concert.

GENERAL ALLEGATIONS OF FACTS

15. Tali is a respected singer, songwriter, and recording artist.

11 16. Tali has been creating music since she was fourteen (14) years old,
12 which in her early years she composed in her bedroom on a humble mini keyboard
13 and microphone and, then, would upload her music to SoundCloud.

14 17. As a prolific songwriter, Tali has recorded and published numerous
15 sound recordings over the past decade.

16 18. Sound recordings from Tali's library of musical compositions are
17 available on several online streaming services, including, but not limited to, Spotify,
18 YouTube, Bandcamp, and SoundCloud.

Tali's "Shadows" Sound Recording

20 19. In December 2013, when she was just eighteen (18) years old, Tali
21 composed all the music and lyrics to her musical composition entitled “Shadows”
22 (the “Song”), which she recorded in her bedroom using her mini keyboard and
23 uploaded it to her SoundCloud page.

24 20. Tali is the sole writer, singer, and producer of the Song, and owns all
25 rights thereto.

26 21. Tali later registered the Song with the Society of Composers, Authors
27 and Music Publishers of Canada (SOCAN).

28 22. Tali also eventually obtained a registration for the Song with the U.S.

1 Copyright Office, namely U.S. Copyright Registration No. SR0000965374. A true
2 and correct copy of U.S. Copyright Registration No. SR0000965374 is attached
3 hereto as Exhibit A. The validity of Tali's copyright in the Song is presumed as a
4 matter of law.

5 ***Defendant's Infringing Remix of the Select Portions of the Song***

6 23. In or around September 2013, Tali reached out to Defendants Hippie
7 Sabotage, expressed her interest in collaborating with Hippie Sabotage, and sent a
8 link to her musical recordings on Tali's SoundCloud page.¹

9 24. In response, Hippie Sabotage confirmed their receipt of Tali's musical
10 recordings and indicated their willingness to work with her, namely:

11 *Your voice and song writing are amazing. We definitely [sic] like to
12 work with you.*²

13 25. Notwithstanding their expressed interest to work together, Hippie
14 Sabotage never followed up with Tali and failed to propose any agreement to
15 collaborate. Tali never heard from them again.

16 26. Several years later, however, Tali stumbled upon a sound recording by
17 Hippie Sabotage that incorporated her Song, and later discovered was also released
18 as a "live" version recording (the "Infringing Recordings," more specifically defined
19 below).

20 27. In fact, the Infringing Recordings contain remixes of select and key
21 portions of the Song.

22 28. Upon information and belief, Defendants Hippie Sabotage reproduced,
23 copied, and/or created derivative works from the Song, to which they had prior
24 access, resulting in the Infringing Recordings.

25 29. The Song and the Infringing Recordings contain substantially similar
26 and defining compositional elements. The substantial similarities found in the Song

27 _____
28 ¹ True and correct copies of direct messages between Tali Kouch and Gadfly are
attached hereto as Exhibit B.

² See Exhibit B.

1 and the Infringing Recordings are the result of many of the same deliberate creative
 2 choices made by their respective composers. Consequently, these works are
 3 substantially similar compositionally.

4 30. The Infringing Recordings are so similar to the Song that the ordinary
 5 observer can easily determine that select, prominent portions of the song sound the
 6 same in the essential compositional and other elements, including, but not limited to,
 7 the following elements:

8 A. The title of the Infringing Recordings “Able to See Me (Tali
 9 Flip)” alone is an inherent admission that the Infringing Recordings is a remix (or
 10 “flip”) of Tali’s Song;

11 B. The title of Infringing Recordings “Able to See Me” is taken
 12 directly from the initial lyrics of Tali’s Song, namely the leading line: “How are you
 13 ***able to see me...;***”

14 C. The Infringing Recordings and Song share identical and
 15 rhythmically similar lyrics, including the following:

| Tali’s Song Lyrics | Infringing Recordings’s Lyrics |
|---|--|
| “I stand in front of you With a few more steps, between us You tried to see the unknown” | “I stand in front of you With a few more steps, between us You tried to see the unknown.” ³ |
| “But you wouldn’t know what you see” | “But you wouldn’t know they’re not what you see” “But you wouldn’t know they’re not watching me” |

27
 28 ³ A true and correct copy of the lyrics for the Infringing Recordings as obtained
 from Spotify, is attached hereto as Exhibit D.

| | | |
|---|--|---|
| 1 | | “But you wouldn’t know they’re not what you |
| 2 | | think” ⁴ |

3 D. The main vocal and instrumental themes of the Infringing
4 Recordings are rooted in the select portions of the Song; namely, the signature phrase
5 “able to see me,” vocals, and keyboard; and

6 E. The Infringing Recordings contain copies of select portions of the
7 Song that have been merely remixed to increase the beat, rhythm, and speed of the
8 Song. Namely, Defendants Hippie Sabotage merely sped up select portions of the
9 Song, and incorporated them in the Infringing Recordings.

10 31. The Infringing Recordings and the Song contain essential compositional
11 elements so similar as to evidence the conscious copying of one in pursuit of the
12 creation of the other.

13 32. The Infringing Recordings copies quantitatively and qualitatively
14 distinct, important, and recognizable portions of the Song.

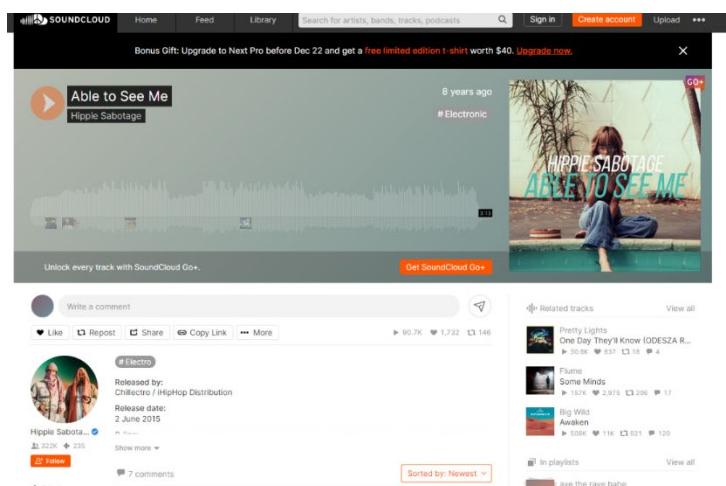
15 33. This unlawful copying has resulted in recordings so similar that the
16 ordinary observer can only conclude that the Infringing Recordings would not exist
17 but for the copying of the Song.

18 34. Upon information and belief, Hippie Sabotage reproduced and created
19 derivative works from the Song, which was distributed by sale and/or publicly
20 performed by means of digital audio transmission by all Defendants, including, but
21 not limited to the following:

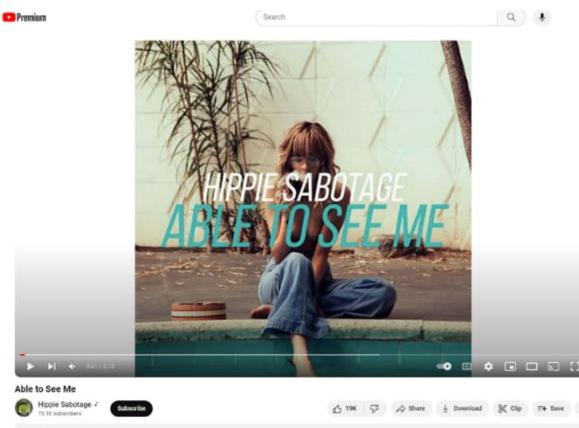
22 A. “Able to See Me (Tali Flip),” released on the Hippie Sabotage
23 SoundCloud page.⁵

24
25
26
27 ⁴ See Exhibit D.

28 ⁵ Available at <https://soundcloud.com/hippiesabotage/able-to-see-me> (last accessed
on December 19, 2023).



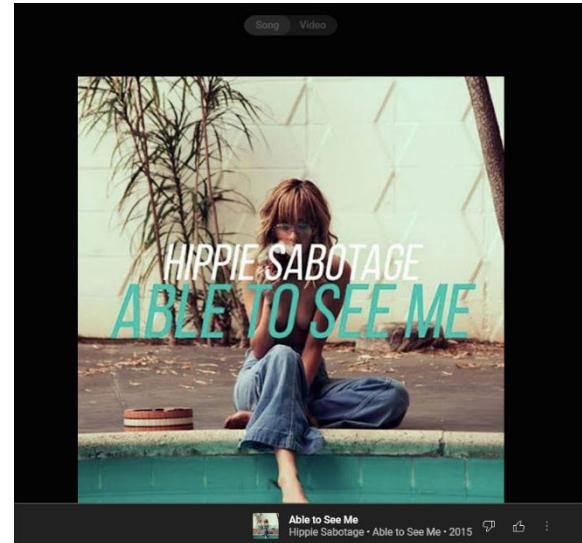
B. "Able to See Me," released on the Hippie Sabotage YouTube page.⁶ A true and correct screen capture of the YouTube release is included below:



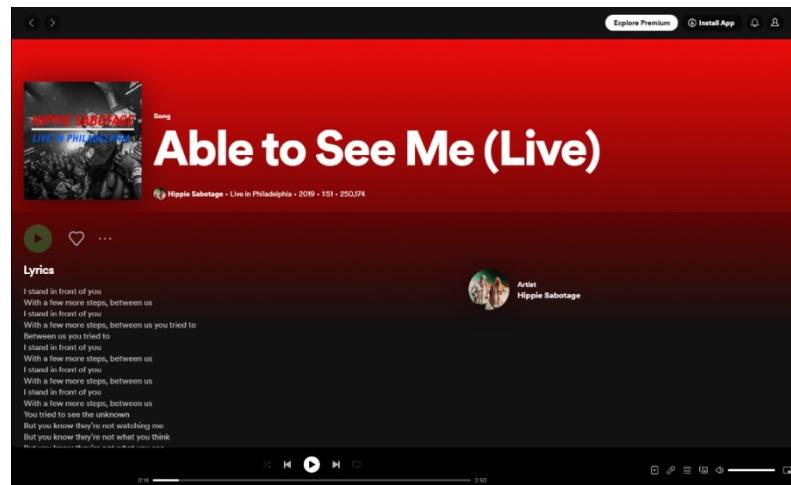
C. "Able to See Me," released on YouTube Music. A true and correct screen capture of the YouTube Music release is included below:⁷

⁶ Available at <https://www.youtube.com/watch?v=3Xa49VpCC9Y> (last accessed on December 19, 2023).

⁷ Available at <https://music.youtube.com/watch?v=3Xa49VpCC9Y&si=VHlfELULoKPZrSUW> (last accessed on December 19, 2023).



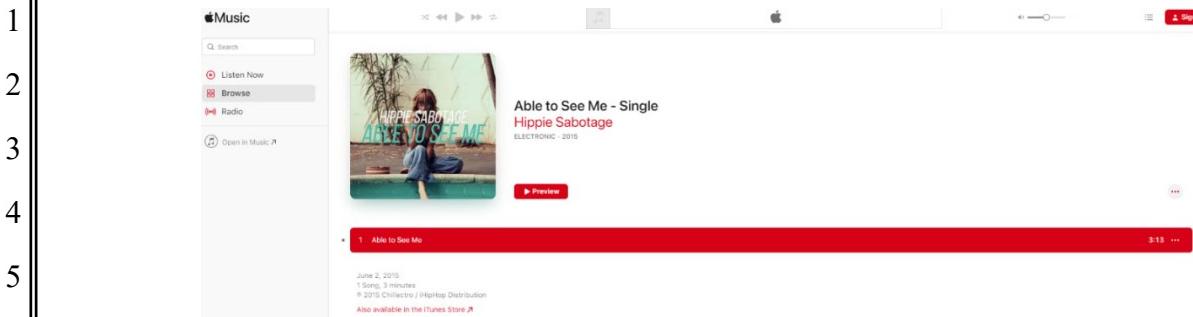
D. "Able to See Me (Live)," released on the Hippie Sabotage Spotify page. A true and correct screen capture of the Spotify release is included below:⁸



E. "Able to See Me," released on Apple Music. A true and correct screen capture of the Apple Music release is included below:⁹

⁸ Available at <https://open.spotify.com/track/1V3q177THzhKV2obfsOvAV?si=c352cf6047d8423e> (last accessed on December 19, 2023).

⁹ Available at <https://music.apple.com/us/album/able-to-see-me/1226559968?i=1226560494> (last accessed on December 19, 2023).



(collectively, the “Infringing Recordings”). True and correct screen captures of each platform where the Infringing Recordings are offered for payback, download, and/or sale are attached hereto as Exhibit C.

35. Defendants, and each of them, unlawfully exploited, and continue to unlawfully exploit, the Song in the Infringing Recordings without the authority or consent of Tali, resulting in the generation of profits and credit in favor of Defendants, and each of them. Further, Defendants’, and each of their, conduct was undertaken purposefully, willfully, knowingly and maliciously to the exclusion of, and without regard to the inevitable damage to Tali.

FIRST CLAIM FOR RELIEF
(Federal Copyright Infringement under 17 U.S.C. § 501)
(Against all Defendants)

36. Tali re-alleges and incorporates by reference all allegations contained in the above paragraphs of this Complaint as though fully set forth herein.

37. Tali is the sole copyright owner of the Song recording “Shadows,” and of all rights, title, and interest in and to the Song.

38. Tali is the owner of the U.S. Copyright Office registration for the Song.

39. Tali’s Song is a sound recording within the meaning of 17 U.S.C. §§ 101 and 102(a)(7).

40. Tali’s Song is an original, creative work of expression fixed in a tangible medium from which it can be perceived, and is subject to full protection under the Copyright Act.

41. The Infringing Recordings are an unauthorized reproduction,

1 distribution, performance, or creation of a derivative work of the Song and infringes
2 Tali's exclusive rights in direct violation of the Copyright Act.

3 42. Defendants reproduced select portions of the Song and created
4 derivative works resulting in the Infringing Recordings, and/or Defendants have
5 distributed, performed, offered for sale and/or sold the Infringing Recordings in the
6 United States, including on the Internet.

7 43. Upon information and belief, Defendants had full knowledge of Tali's
8 rights in the Song at the time Defendants copied key portions of it.

9 44. Upon information and belief, Defendants were aware that their acts
10 constituted infringement of the Tali's copyright in the Song.

11 45. Tali's Song is, and has been, widely disseminated.

12 46. The similarities between select portions Tali's Song and the Infringing
13 Recordings are so substantial and so striking that it is highly unlikely the works were
14 created independent of one another.

15 47. Defendants, and each of them, committed all of the acts alleged herein
16 without Tali's authorization, permission, license, or consent.

17 48. By reproducing, creating derivative works, distributing, performing,
18 selling, and/or otherwise using select portions of the Song in the Infringing
19 Recordings that are identical and/or substantially similar to the select portions of the
20 Song without Tali's consent, Defendants, and each of them, have infringed on Tali's
21 exclusive rights in the Song, and have violated § 501 of the Copyright Act.

22 49. Upon information and belief, Defendants, and each of them, have
23 benefited from the infringement of Tali's Song through the profits generated from
24 the sales and performance of the Infringing Recordings or variants thereof.

25 50. Upon information and belief, Defendants each have or have had the right
26 and ability to supervise and/or control the infringing activities of one another.

27 51. Upon information and belief, Defendants have each directly benefitted
28 financially from the others' infringing activities.

1 52. As a result, in addition to, or as an alternative to, the direct liability
2 outlined above, either Defendants is vicariously liable for the infringement alleged
3 herein.

4 53. To the extent any of the Defendants are not directly liable for infringing
5 the copyrights in Tali's Song, each of them is vicariously liable.

6 54. Upon information and belief, Defendants, and each of them, knew or
7 had reason to know of, the others' infringing activity and intentionally induced or
8 materially contributed to that infringing activity.

9 55. Defendants', and each of their, intent to induce the infringing activity is,
10 upon information and belief, demonstrated by affirmative steps taken by each to
11 encourage the others' activity in the infringement of Tali's Song.

12 56. As a result, Defendants, and each of them, are liable for contributory
13 infringement to the extent any are not liable for direct infringement of Tali's Song.

14 57. Defendants', and each of their, wrongful actions continue to deprive Tali
15 of her rights and benefits in the Song, which include the exclusive right to use,
16 reproduce, distribute, perform, sell, and create derivative works using the Song.

17 58. Unless enjoined by the Court, Defendants, and each of them, will
18 continue to wrongfully use and infringe on Tali's copyright in the Song by continuing
19 to distribute, perform, create derivative works, and/or profit from the sale of the
20 Infringing Recordings or variants thereof.

21 59. As the direct and proximate result of Defendants', and each of their,
22 infringement of the copyright in the Song, Tali has suffered, and will continue to
23 suffer, monetary damages, and irreparable injury to her business, reputation, and
24 goodwill.

25 60. Tali is entitled to injunctive relief and an award of Tali's actual damages
26 and to Defendants' profits directly or indirectly attributable to such infringement and
27 related reasonable attorneys' fees.

28

SECOND CLAIM FOR RELIEF
**(Copyright and Moral Rights Infringement under
the Canadian Copyright Act)**
(Against all Defendants)

61. Tali re-alleges and incorporates by reference all allegations contained in the above Paragraphs 1-35 of this Complaint as though fully set forth herein.

62. This is an action for copyright infringement under Section 27 and moral rights infringement under Sections 28.1 and 28.2 of the Canadian Copyright Act.

63. Copyright infringement constitutes a transitory and reciprocal cause of action, and may be adjudicated in the courts of a sovereign state other than the one in which the cause of action arose.

64. The Berne Convention for the Protection of Literary and Artistic Works (the “Berne Convention”) requires a signatory state to accord the same copyright protection that it offers to its own citizens to works authored by other signatory states’ citizens.

65. Both the United States and Canada are signatory states to the Berne Convention, and, as a result, the United States accords such protection to Canadian authors.

66. Pursuant, inter alia, to Section 5(1) of the Canadian Copyright Act, when the Song was first created, Canadian law automatically protected the copyrights therein, without first requiring registration or other formalities.

67. Tali was the first artist to create the Song and as a result, Tali and her Song became well known and recognized by the public.

68. Defendants, and each of them, have, and continue to, reproduce, create derivative works, distribute, perform, sell, and/or otherwise use select portions of the Song in the Infringing Recordings in Canada.

69. Defendants, and each of them, were aware of Tali's rights in the Song when they began to reproduce, create derivative works, distribute, perform, sell, and/or otherwise use select portions of the Song in the Infringing Recordings in

1 Canada, and have knowingly attempted to deny Tali of her right to be associated as
2 the author of her own Song.

3 70. Defendants, and each of them, committed infringing acts in Canada
4 without Tali's authorization, permission, license, or consent.

5 71. Defendants, and each of them, have benefitted from their infringement
6 of the Song through the profits generated from the performance and sales in Canada
7 of the Infringing Recordings and, unless restrained, will continue to benefit
8 therefrom.

9 72. Under Section 27 of the Canadian Copyright Act, Defendants, and each
10 of them, have infringed Tali's copyright in the Song by, inter alia, reproducing,
11 distributing, performing, selling, and/or otherwise using the Infringing Recordings or
12 otherwise offering the Infringing Recordings for sale in Canada for this purpose, and
13 for otherwise dealing with rights in the Song reserved exclusively to the copyright
14 owner under Section 3(1) of the Canadian Copyright Act, all without Tali's consent.

15 73. Additionally, and in the alternative, Defendants, and each of them, have
16 infringed Tali's moral rights under Section 28.1 of the Canadian Copyright Act by
17 denying her the right to be associated by name with her own Song.

18 74. Additionally, and in the alternative, Defendants, and each of them, have
19 infringed Tali's moral rights under Sections 28.1 and 28.2 of the Canadian Copyright
20 Act by distorting, altering, remixing, and "flipping" select portions of the Song,
21 without Tali's authorization, permission, or consent.

22 75. As a result of Defendants', and each of their, infringing acts, Tali is
23 entitled under Sections 34 and 35 of the Canadian Copyright Act to preliminary and
24 permanent injunctions, and

25 A. Damages, including punitive damages, and a disgorgement of
26 Defendants' profits to the extent that such profits are not taken into account in the
27 calculation of damages; or

28 B. In the alternative, an award of statutory damages for each instance

1 of Defendants' infringement of the Song, as prescribed under Section 38.1 of the
2 Canadian Copyright Act.

3 **REQUEST FOR RELIEF**

4 **WHEREFORE**, as to all of her Claims, Tali respectfully prays that this Court
5 enter judgment in her favor and against Defendants, and each of them, for relief as
6 follows:

7 1. A preliminary and permanent injunction pursuant to the U.S. Copyright
8 Act, 17 U.S.C. §§106 and 502, and Canadian Copyright Act, Sections 34(1), 34(2),
9 and 39.1 requiring Defendants, and each of their officers, agents, servants,
10 employees, owners and representatives, and all other persons, firms or corporations
11 in active concert or participation with them, be preliminarily and permanently
12 enjoined and restrained from reproducing, creating derivative works, publishing,
13 distributing, or performing the Infringing Recordings in any manner in both the
14 United States and Canada;

15 2. A mandatory injunction pursuant to the U.S. Copyright Act, 17 U.S.C.
16 §§106 and 503, and Canadian Copyright Act, Sections 34(1), 34(2), and 38 requiring
17 Defendants, and each of their officers, agents, servants, employees, owners and
18 representatives, and all other persons, firms or corporations in active concert or
19 participation with them, impounding, as well as destroying and/or delivering up for
20 destruction all the Infringing Recordings, including all masters, tapes, or other
21 articles by means of which such copies or phone records may be reproduced;

22 3. An order requiring the U.S. Copyright Office to cancel any and all U.S.
23 Copyright registrations and/or pending applications for the Infringing Recordings
24 owned by Defendants, their officers, agents, servants, employees, owners and
25 representatives, and all other persons, firms or corporations in active concert or
26 participation with them;

27 4. An order requiring Defendants, their officers, agents, servants,
28 employees, owners and representatives, and all other persons, firms or corporations

1 in active concert or participation with them, to assign, transfer, and release to Tali
2 any and all registrations concerning the Infringing Recordings with any and all
3 Performance Rights Organizations, including ASCAP, BMI, and SESAC;

4 5. An order requiring Defendants, their officers, agents, servants,
5 employees, owners and representatives, and all other persons, firms or corporations
6 in active concert or participation with them, to immediately remove the Infringing
7 Recordings from any and all online and streaming platforms;

8 6. Judgment against Defendants, and each of them, for their infringement
9 under the U.S. Copyright Act, 17 U.S.C. §§106 and 501, and for the willful,
10 intentional and purposeful disregard and indifference to Tali's rights. Tali is therefore
11 entitled to Defendants' profits attributable to the infringement, pursuant to 17 U.S.C.
12 §504, including an accounting and/or statutory damages. Further, Tali is entitled to
13 her reasonable attorneys' fees and full costs pursuant to 17 U.S.C. §505 and otherwise
14 according to law. Further, as a direct and proximate result of the violations of the
15 Copyright Act, Tali has sustained, and will continue to sustain, substantial,
16 immediate and irreparable injury for which there is no adequate remedy at law, such
17 that damages should include permanent injunctive relief;

18 7. Judgment against Defendants, and each of them, for their infringement
19 under the Canadian Copyright Act, Sections 34 and 35, and for the willful, intentional
20 and purposeful disregard and indifference to Tali's rights. Tali is therefore entitled to
21 an award for punitive damages, and accounting of all profits earned by Defendants,
22 and each of them, as a result of their infringing acts to the extent that such profits are
23 not taken into account in the calculation of damages; or, in the alternative, an award
24 of statutory damages for the Song as infringed upon by Defendants, and each of them,
25 as prescribed under the Canadian Copyright Act, Section 38.1;

26 8. Imposition of a constructive trust for the benefit of Tali on all revenues
27 generated by Defendants, and each of them, from the sale of the Infringing
28 Recordings, or any substantially similar recordings;

1 9. A award of prejudgment and post-judgment interest in an amount to be
2 ascertained at trial; and

3 10. Such other and further relief as the Court deems just, equitable, and
4 proper.

JURY DEMAND

6 Pursuant to Fed. R. Civ. P. 28, Tali hereby demands a trial by jury on all issues
7 for which a trial by jury may be had.

8 Dated: December 21, 2023.

DICKINSON WRIGHT PLLC

By: /s/ John L. Krieger

John L. Krieger

Caleb L. Green (*pro hac vice to be submitted*)

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